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January 14, 2022

By ECF

The Honorable Stewart D. Aaron
United States District Court
for the Southern District of New York
500 Pearl Street, Room 1970
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup Inc., et al.,
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Aaron:

The Parties submit this joint letter to request a modification of Paragraph 1 of the November 27, 2021 Discovery Order (ECF Document # 57) which currently requires substantial completion of document discovery by January 21, 2022. Counsel seek to extend the substantial completion date for document discovery to February 11, 2022. No modification to Paragraph 2 (completion of fact discovery) or Paragraph 3 (completion of all discovery) is sought at this time.

The Parties have met and conferred a number of times (most recently on January 4, 10 and 14, 2022) in attempts to resolve outstanding discovery disputes. We have made substantial progress in resolving those disputes and will continue to meet and confer in further attempts to resolve the remaining issues, in the hope that we will not have to burden the Court or, if we do, any disputes will be reduced to a minimum.

Law Office of Gary Greenberg, Esq.


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Respectfully submitted,

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